

# **Exhibit 2**

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

In re

CUSTOMS AND TAX ADMINISTRATION OF THE  
KINGDOM OF DENMARK (SKAT) TAX REFUND  
LITIGATION

This paper applies to: 19-cv-1867 (LAK), 19-cv-1868  
(LAK), 19-cv-1869 (LAK), 19-cv-1895 (LAK),  
19-cv-1896 (LAK), 19-cv-1898 (LAK), 19-cv-1904  
(LAK), 19-cv-1906 (LAK), 19-cv-1911 (LAK),  
19-cv-1924 (LAK)

x

USDC SDNY
DOCUMENT
ELECTRONICALLY FILED
DOC #: 12-11679
DATE FILED: 12-16-19

18-md-2865 (LAK)

**PRETRIAL ORDER NO. 13**  
(Defendants' Motion to Dismiss Under Rule 12(b)(1))

LEWIS A. KAPLAN, *District Judge*.

The motion to dismiss under Rule 12(b)(1) [18-md-2865, DI-134] is denied for substantially the reasons stated in SKAT's memorandum dated July 19, 2019 [18-md-2865, DI-158].

SO ORDERED.

Dated: December 16, 2019



---

Lewis A. Kaplan  
United States District Judge